

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STARWOOD HOTELS & RESORTS
WORLDWIDE, INC., STARWOOD (M)
INTERNATIONAL, INC. and PREFERRED
GUEST, INC.,

Plaintiffs,

- vs. -

PM HOTEL ASSOCIATES, L.P. and PARKER
PALM SPRINGS LLC,

Defendants.
-----X

Case No. 13 CV 38 (KBF) (JLC)

**DECLARATION OF R. JOSHUA BLISS IN OPPOSITION
TO DEFENDANTS' MOTION TO DISMISS THE COMPLAINT**

R. JOSHUA BLISS, an attorney admitted to practice in the Southern District of New York, declares under penalty of perjury that the following is true and correct:

1. I am an attorney associated with Bryan Cave LLP, counsel for plaintiffs Starwood Hotels & Resorts Worldwide, Inc. ("Starwood Hotels"), Starwood (M) International, Inc. ("Starwood International"), and Preferred Guest, Inc. ("PGI" and collectively, "Starwood") in this action.

2. I submit this declaration to place before the Court true and correct copies of certain documents referenced in Starwood's Memorandum of Law In Opposition to Defendants' Motion to Dismiss.

3. Annexed hereto as Exhibit A is a true and correct copy of a letter dated January 27, 2012 from Noah Weissman of Bryan Cave LLP to Adam Glick and referenced in Paragraph 71 of the Complaint.

4. Annexed hereto as Exhibit B is a true and correct copy of the letter dated February 27, 2012 from Steven M. Stimell of Bryan Cave LLP to Marc E. Kasowitz. and Daniel J. Fettermen, both of Kasowitz Benson Torres & Friedman LLP, and referenced in Paragraph 72 of the Complaint.

5. Annexed hereto as Exhibit C is a true and correct copy of a letter dated December 27, 2012 from Adam Glick to Sirgio Rivera. This letter is also referenced in Exhibit 9 to the Declaration of Christian T. Becker, dated February 26, 2013.

6. Annexed hereto as Exhibit D is a true and correct copy of a non-waiver agreement, dated March 20, 2012, between Starwood and Defendants.

Dated: New York, New York
March 19, 2013

By:


R. Joshua Bliss, Esq.